

MELINDA HAAG (CSBN 132612)  
 United States Attorney  
 JOANN M. SWANSON (CSBN 88143)  
 Chief, Civil Division  
 MICHAEL T. PYLE (CSBN 172954 )  
 JAMES A. SCHARF (CSBN 152171)  
 Assistant United States Attorneys

U.S. Attorney's Office/Civil Division/San Jose Branch  
 150 Almaden Blvd., Suite 900  
 San Jose, California 95113  
 Telephone: (408) 535-5044  
 Facsimile: (408) 535-5081  
 E-mail: [james.scharf@usdoj.gov](mailto:james.scharf@usdoj.gov)

Attorneys for Defendant United States of America

ALI R. MOGHADDAMI (CSBN 174548)  
 Moghaddami & Sadigh  
 333 East Glenoaks Boulevard, Suite 202  
 Glendale, CA 91207-2099  
 TEL: (818) 500-4111  
 FAX: (818) 500-4144  
 E-mail: [amoghi@aol.com](mailto:amoghi@aol.com)

MICHAEL L. ORAN (CSBN 110970)  
 Law Office of Michael L. Oran  
 800 Wilshire Boulevard  
 Suite 500  
 Los Angeles, CA 90017  
 Telephone: (213) 624-1177  
 Facsimile: (213) 624-1161  
 E-mail: [miloran@mloesq.com](mailto:miloran@mloesq.com)

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

BENHAM HALALI,	)	No. 09-4900 RS
	)	
Plaintiff,	)	<b>STIPULATION AND <del>PROPOSED</del></b>
	)	<b>ORDER RE EXPERT DEPOSITION</b>
v.	)	<b>DISCOVERY AND FURTHER CMC</b>
	)	
UNITED STATES OF AMERICA ET AL.,	)	
	)	
Defendants.	)	

1 Whereas, the parties have completed all non-expert discovery, in compliance with the Court's  
2 April 21, 2011, Case Management Scheduling Order, Document 41, ("CMSO").

3 Whereas, plaintiff served his expert disclosures on September 16, 2011, in compliance with  
4 the CMSO.

5 Whereas, defendant will serve its expert disclosures on November 4, 2011, in compliance  
6 with the CMSO.

7 Whereas, the CMSO provides that expert deposition discovery must be completed by  
8 November 18, 2011.

9 Whereas, a Further Case Management conference is set for November 17, 2011, at 10:00 a.m.

10 Whereas, the parties have scheduled a full-day, private mediation with Charlie Hawkins on  
11 November 22, 2011.

12 Whereas, in order to conserve resources, the parties desire to briefly postpone expert  
13 deposition discovery and the Further Case Management Conference until after the mediation.

14 Whereas, the requested postponement will not affect any of the other dates imposed by the  
15 CMSO, including the February 2, 2012, Pretrial Conference and the February 13, 2012, Trial.

16 Therefore, the parties jointly request the Court to extend expert deposition discovery to  
17 December 23, 2011. The parties further request that the Further Case Management Conference  
18 be continued to December 1, 2011, at 10:00 a.m., or to any date thereafter that may be more  
19 convenient to the Court.

20  
21 Dated: September 23, 2011

22 Respectfully submitted,

23 MELINDA HAAG  
24 United States Attorney


25 By: /S/  
26 JAMES A. SCHARF  
27 Assistant United States Attorney  
28 Attorney for Defendant

LAW OFFICE OF MICHAEL L. ORAN

By: /S/  
MICHAEL L. ORAN  
Attorney for Plaintiff

Pursuant to the parties' stipulation, and good cause appearing, it is hereby ordered:  
Expert deposition discovery is extended to December 23, 2011. The Further Case Management  
Conference is continued to December 1, 2011, at 10:00 a.m. ~~[or]~~ ~~\_\_\_\_\_~~

Dated: September 27, 2011

  
Hon. Richard Seeborg  
United States District Court Judge